

MDL No. 1917

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27

28

1

2

3

4

T	1:	ncins	R	Lan	hereby	declare	as follows:
т.	ı	ucius	D .	Lau.	HCICUV	ucciaic	as fullows

- 1. I am an attorney with the law firm of White & Case LLP, counsel for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic Components, Inc. (collectively, the "Toshiba Defendants").
- 2. I submit this declaration in support of the Toshiba Defendants' Response to IPPs' Motion *in Limine* No. 10: Motion to Exclude the Testimony of Witnesses Not Designated Pursuant to the Court's Scheduling Orders.
- 3. Attached hereto as Exhibit A is a true and correct copy of the Defendants' Witness List, dated January 22, 2015.
- 4. Attached hereto as Exhibit B is a true and correct copy of the IPPs' Witness List, dated December 5, 2014.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of February, 2015, in Washington, D.C.

Idicius B. Idu